

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Hon. Steven W. Rhodes

Debtor.

**UNOPPOSED MOTION TO ADJOURN HEARING**

ST. MARTINS COOPERATIVE, through its attorneys, LAW OFFICES OF LEE & CORRELL, moves for relief from the stay in this matter, pursuant to F.E.D. Mich. LBR 9014-1, for the purpose of pursuing adjourning the hearing on its Motion for Relief from Stay, and states as follows:

1. St. Martins filed its Appearance on or about October 9, 2013.
2. St. Martins filed its Motion for Relief from Stay in this matter on October 11, 2013.
3. The Debtor Detroit filed its Objections to the Motion on October 25, 2013.
4. This Court set a hearing date of November 14, 2013 on the Motion. (Exhibit A).
5. St. Martins filed its Reply on November 1, 2013.
6. On October 26, 2013, St. Martins retained alternate Counsel.
7. Substitute Counsel will be out of town on November 14, 2013, the date that this Court has set for hearing on the Motion for Relief from Stay. (Exhibit B).

8. St. Martins now seeks to adjourn the hearing to give Substitute Counsel a chance to return and prepare for the hearing...

9. St. Martins requests a two week adjournment, but since that time will be the Thanksgiving Holliday, St. Martins requests a time after December 2, 2013.

10. On November 7, 2013, St. Martins contacted Counsel for the Debtor and sought concurrence; Counsel for the Debtor expressed no objection to this Motion.

**WHEREFORE**, the St. Martins Cooperative prays that this Honorable Court grant its Unopposed Motion to Adjourn the Hearing until a date after December 2, 2013.

LAW OFFICES OF LEE & CORRELL

By: /s/ Michael K. Lee  
MICHAEL K. LEE (P40012)  
Attorneys for St. Martins Cooperative  
24901 Northwestern Highway, Suite 113  
Southfield, Michigan 48075  
mlee@leeandcorrell.com  
(248) 350-5900

Dated: November 8, 2013

# EXHIBIT A

Form ntcnrg

211 West Fort Street  
Detroit, MI 48226

UNITED STATES BANKRUPTCY COURT  
Eastern District of Michigan

---

Case No.: 13-53846-swr  
Chapter: 9  
Judge: Steven W. Rhodes

In Re: (NAME OF DEBTOR(S))  
City of Detroit, Michigan  
2 Woodward Avenue  
Suite 1126  
Detroit, MI 48226

Social Security No.:

Employer's Tax I.D. No.:  
38-6004606

---

NOTICE OF HEARING

PLEASE TAKE NOTICE that a hearing will be held at U.S. Courthouse, Courtroom 716, 231 W. Lafayette, Detroit, MI 48226 on 11/14/13 at 10:00 AM to consider and act upon the following:

1155 – Motion for Relief from Stay . Fee Amount \$176, Filed by Creditor St. Martins Cooperative (Attachments: # 1 Proposed Order # 2 Notice of Opportunity to Respond # 3 Brief in Support # 4 Certificate of Service # 5 Memorandum dated March 21, 2008 # 6 Correspondence dated April 1, 2008 # 7 Memorandum dated April 4, 2008 # 8 Notice of Receipt of FOIA Request # 9 Letter dated May 19, 2008 # 10 Letter dated March 3, 2009 # 11 Letter dated March 3, 2009 # 12 Notice of Settlement of Class Action # 13 Letter dated January 7, 2009 # 14 Opinion and Order dated April 25, 2011) (Lee, Michael)

Dated: 10/30/13

BY THE COURT

Katherine B. Gullo  
Clerk, U.S. Bankruptcy Court

BY: christine sikula  
Deputy Clerk

# EXHIBIT B

## Michael K. Lee

---

**From:** Randall Pentiuk <rpentiuk@pck-law.com>  
**Sent:** Wednesday, November 06, 2013 11:24 AM  
**To:** mlee@leeandcorrell.com  
**Subject:** St Martin v DWSD  
  
**Importance:** High

Dear Mr. Lee:

I am in receipt of your letter of Nov 4 2013 on this matter and note that there is a hearing on Nov 14. Can you get that hearing adjourned? I scheduled to be out of town on that day, and I also need time to get prepared. I have not taken any action on the substitution of counsel yet. If there is anything you can do to push this back for a few weeks, I would appreciate it.

Thanks,  
Randy Pentiuk

*To update your address book with my contact info, please scan the QR code below.*



**"The highest compliment we can receive is the referral of your friends, family and business associates. Thank you for your trust."**

**Confidential Attorney Client Communication/Attorney Work Product.** This e-mail may contain confidential or privileged material and is intended for use solely by the above referenced person(s)/recipient(s). Any review, copying, printing, disclosure, distribution, or other use by any other person or entity is strictly prohibited. If you have received this transmission in error, please notify the sender by an electronic message to the sender and delete the copy you received. Thank you. **Electronic Signature Disclaimer.** The information block, the typed name of the sender, nor anything else in this message is intended to constitute an electronic signature unless a specific statement to the contrary is indicated in this message.

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Hon. Steven W. Rhodes

Debtor.

/

**ORDER GRANTING ST. MARTINS' UNOPPOSED MOTION TO ADJOURN  
HEARING ON MOTION FOR RELIEF FROM STAY**

The Court, having read St. Martins' Unopposed Motion to Adjourn Hearing on Motion For Relieif from Stay, ; and being advised that all parties in interest have been given notice; and being advised that no objections were filed or received; and being otherwise fully advised in the premises;

**NOW THEREFORE IT IS HEREBY ORDERED AND ADJUDGED**, that St. Martins Motion be, and hereby is, **GRANTED**;

**IT IS FURTHER ORDERED AND ADJUDGED** that the hearing on the Motion for Relief from Stay be, and hereby is, adjourned to a date after December 2, 2013 to allow Substitute Counsel to participate.

---

**BANKRUPTCY COURT JUDGE**

Dated:

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Hon. Steven W. Rhodes

Debtor.

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2013, I filed with the Court via the Court's CM/ECF System the following papers: **Unopposed Motion to Adjourn Hearing on Motion for Relief from Stay, Order Granting Unopposed Motion to Adjourn Hearing on Motion for Relief from Stay** and this **Certificate of Service**. The pleadings will be served on all parties who are required to receive service via the Court's Notice of Electronic Filing.

/s/ Michael K. Lee  
MICHAEL K. LEE